'-The Holiday-Beverly Hills channel swap would allow SFI to upgrade its facility on Channel 293C2. This will allow WSRZ to compete more effectively with other high power FM stations in its market area.

- 2. If the licenses of Gator and SFI are modified to authorize operation on the higher class channels, each licensee will promptly construct its authorized facilities. In a Petition for Rulemaking filed on August 28, Pasco expressed its intention to apply for and construct C2 facilities.4/
- 3. The proposed channel substitutions at Sarasota, Micanopy, and Holiday can be made, and the licenses of WGGG-FM, WSRZ(FM), and WLVU-FM can be modified to specify operation on the higher class channels, pursuant to Section 1.420(g) of the Commission's rules. The Micanopy and Sarasota upgrades on second and first adjacent channels, respectively, are clearly mutually exclusive with the current allotments in those communities. Thus, no competing expressions of interest would be allowed.

^{3/(...}continued) interest.

As demonstrated herein, the proposed Holiday upgrade fits squarely within the Commission's definition of "incompatible channel swaps" and thus can be accomplished without acceptance of competing expressions of interest. Counsel to Pasco has assured counsel to Gator and SFI that it will continue to support the proposal set forth herein if it can be upgraded on 246C2 without having to compete for that channel.

Counsel to Pasco has indicated to counsel to SFI and Gator that it will apply for and construct facilities to operate on Channel 246C2 if authorized.

'4. The proposed channel substitutions at Beverly Hills and Holiday can also be made without solicitation of competing expressions of interest in the higher class channel at Holiday. In Modification of FM Broadcast Licenses to Higher Class Co-Channel or Adjacent Channels, 60 RR2d 114 (1986) ("FM Upgrade Licensing"), the Commission considered certain variations of the mutual exclusivity rule that would encourage existing licensees to upgrade while protecting their interests in their existing facilities. The Commission hypothesized the case in which

a Class A licensee operating on Channel 240A files a request to upgrade on Channel 271C2 and proposes to exchange channels with a licensee in another community currently operating on Channel 270A. It is argued that although Channels 240A and 271C2 are not adjacent, nevertheless Channel 271C2 is not available in the Ashbacker sense for application by other interested parties, because Channel 270A must be replaced with 240A in order for the upgrade to be possible. Only the licensee on Channel 240A could utilize Channel 271C2 in this scenario.

- <u>Id</u>. at 120. The Commission recognized in this hypothetical the possible mutually exclusive relationships of nonadjacent channels. It stated that rather than foreclose this type of incompatible channel swap, it would analyze such requests on a caseby-case basis to determine whether the mutual exclusivity rationale applies.
- 5. The proposal to upgrade WLVU-FM calls for exactly the kind of incompatible channel swap contemplated by the Commission

in FM Upgrade Licensing, and it should be analyzed in the context of that opinion. The rationale for the adjacent channel upgrade procedure is the recognition that the proposed channel cannot be used in a given city simultaneously with the petitioner's existing operation. It would unnecessarily place the existing station's authorization at risk to entertain competing applications for the proposed allotment. Cf. FM Channel

Assignments (Dyersburg, Tennessee), MM Docket No. 87-563, DA 89-597, released June 12, 1989. Indeed, few, if any, licensees --sure to face an expensive hearing and possible loss of their license -- would ever request an upgrade in those circumstances.

- 6. The same rationale applies to indirect "channel swap" upgrades. Although the proposed upgrade is not co-channel or on an adjacent channel, the existing and proposed operations are mutually exclusive because the existing channel must be substituted in another mutually exclusive location so that the upgrade channel can be used where proposed. There is no policy reason for distinguishing between upgrades that are mutually exclusive with existing operations because of channel adjacency, and those that are mutually exclusive because of a necessary channel swap. Cf. Dyersberg, Tennessee, supra at para. 17.
- 7. In the instant case, Channel 292A cannot be used at both Beverly Hills and Holiday. And, Channel 292A is the only alternative channel available for use at Beverly Hills. See "Engineering Statement of Alvin Andrus", attached hereto. The

swap of Channel 292 with Channel 246 between the cities leaves Holiday with an upgrade and Beverly Hills with a less siterestricted allotment. Only by making this substitution can Channel 246C2 be used at Holiday. Because no other channels are available for use at Beverly Hills, the continued operation of WLVU-FM at Holiday on Channel 292 is not compatible with operation of a new station there on channel 246C2. Thus, this proposal constitutes an incompatible channel swap, fully consistent with the rational for allowing automatic upgrades onto adjacent channels. See, Dyersburg, Tennessee, supra. As the same reasoning applies, the Holiday upgrade proposal must be treated like an adjacent or co-channel upgrade request, allowing WLVU-FM an "automatic" upgrade onto Channel 246C2 without facing competing expressions of interest. Upgrading WLVU-FM on Channel 246 allows the upgrade of WSRZ on Channel 293, and the use of Channel 292A instead of 246A at Beverly Hills. That, in turn, allows the proposed upgrade of WGGG-FM on Channel 247.

8. Since the filing windows for both allotments have closed, no obstacle to the proposed channel substitutions at Beverly Hills and Chiefland exists. The sites specified by all three Chiefland applicants are fully spaced for operation on Channel 300. While the use of Channel 300 would require a change in transmitter site for these applicants, this is not a bar to acceptance of this proposal. The Commission has repeatedly held that an applicant has no vested interest in a particular trans-

mitter site. A specified site is, at best, a preference for a particular location, and cannot defeat service improvements proposed in allotment proceedings. 5/ In any case, two of the three applicants for the Chiefland channel have agreed voluntarily and in writing to move their sites to accommodate the improvements presented here; and the third appears willing to reach an agreement to specify a compatible site.

9. The proposed Beverly Hills substitution likewise comports in all respects with the Commission's rules, and in fact would offer the potential for improved service to that community, since the substitutions would eliminate a site restriction and allow the transmitter to be located closer to the center of the population.

Conclusion

The proposal advanced would bring first wide area service to both Micanopy and Holiday, would greatly improve service to Sarasota, and would remove a site restriction while allowing otherwise equivalent service at Beverly Hills. Because of the

^{5/} See e.g., Hilton Head Island, South Carolina, 3 FCC Rcd 4312 (MMB 1988); Topsail Beach, North Carolina, 3 FCC Rcd 159 (MMB 1988); Freedom and Morgan Hill, California, 2 FCC Rcd 2182 (MMB 1987); Las Vegas, Nevada, 59 RR 2d 1330 (MMB 1986); Andalusia, Alabama, 49 FR 33301 (August 13, 1984); see also Freeport, Texas, 44 RR 2d 135 (1980); Hearing Designation Order (Kittery, Maine), DA 87-1783, released December 23, 1987.

significant service improvements obtained, Gator and SFI request that the Commission expeditiously adopt the allotment proposal set forth herein and modify their licenses to specify operation on the proposed higher class channels.

Respectfully submitted,

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GATOR BROADCASTING CORPORATION

Rs

David D. Oxenfo John K. Hane Lisa C. Wilson

Its Attorneys

SARASOTA FM, INC.

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Michael H. Bader Theodore D. Kramer David G. O'Neil

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Date: August 30, 1989

ENGINEERING STATEMENT OF BARRY MAGRILL

MAGRILL ENGINEERING

POST OFFICE BOX 689 FAIRFIELD, FLORIDA 32634 TELEPHONE (904) 591-3005

BARRY MAGRILL, EI PRESIDENT

May 3rd, 1989

STATEMENT OF QUALIFICATIONS

My credentials are currently on file with the Commission. They include possession of a General Radio-telephone Lifetime License, a Bachelor of Science degree in Electrical Engineering Technology, and a current Engineerin-training certificate issued by the State of Florida. Recent work experience includes consultation to WNFI-FM, KRIX-FM, and WGGG AM and FM.

I am a Technical Consultant retained by Gator Broad-casting and Monroe Television, Inc., for the purpose of preparing the proposed upgrades in Micanopy and Chiefland, Florida. Under penalty of perjury, this statements are made in good faith, and are true to the best of my knowledge.

AFFIDAVIT

STATE OF FLORIDA, COUNTY OF ALACHUA.

Before me this day personally appeared Barry Magrill, who, being duly sworn, deposes and says that this document is true to the best of his knowledge.

Barry Magrill, E.I.

Sworn to and subscribed before me this 3rd Day of May, 1989.

Notary Public State of Florida

the angle of the Business Horida at Lance by the control to direct Suptember 5, 1992 award in a few and bonding Agency

ENGINEERING STATEMENT

This engineering statement demonstrates that the basic facilities requested by applicants and parties in the Florida communities of Micanopy, Holiday, Beverly Hills, Avon Park, Chiefland, and Sarasota, can be all be accommodated. there is no need to deny the requests of any party.

In a nutshell, this proposal would allow the following requested service improvements and advantages over previous proposals:

-Holiday: upgrade from A to C2 on present site

-Micanopy: upgrade from A to C2 on MX channel -Chiefland: channel substitution on MX channel

-Beverly Hills: reduce site restriction; improved service -Cross City: upgrade from A to Cl on MX channel or to full Class A facilities

-Avon Park: avoid channel change

-Sarasota: upgrade from A to C2 on MX channel

Gator Broadcasting requests upgrade from Channel 249A to 247C2 at Micanopy. This change can be effected with channel substitutions at Chiefland and Beverly Hills. Channel 300 can be substituted for the currently alloted and mutually exclusive Channel 247A at Chiefland. 1 Two of the three Chiefland applicants have endorsed the substitution, and the third is willing to settle with the other two. Therefore, there is no impediment to substitution at Chiefland.

^{1/} Channel 247 and Channel 300 are mutually exclusive IF Channels (53 channels apart).

This proposal also calls for swapping Channel 246, currently assigned to Beverly Hills, with Channel 292, which is allotted to Holiday. This swap would allow Pasco Pinellas Broadcasting, Inc., licensee of Channel 292 in Holiday, to upgrade onto Channel 246C2 at its current transmitter site. Pasco had originally requested upgrade on Channel 292, but that would have required channel substitutions at Avon Park and Sarasota, Florida. The proposal made here would allow an upgrade of the Sarasota allotment from Channel 292A to Channel 293C2. Therefore, the current proposal is superior to Pasco's original request.

The substitution of Channel 292A for 246A at Beverly Hills would also benefit the ten applicants currently vying for that allocation. Channel 292 would be less site-restricted than 246 at Beverly Hills, and would allow applicants for that allocation to move closer to the city of license. The fact that some of the pending applicants' sites would be short-spaced to the current operation of WDFL, Cross City, is not an issue since WDFL has voluntarily agreed to move its transmitter site to the northwest of Cross City to facilitate the Beverly Hills substitution by eliminating all potential short-spacings to specified sites and the allocation. This move would be beneficial to Cross City, since such a move would allow WDFL to upgrade to full class A facilities and increase its 1 mV area coverage by 76%. Since the area covered by WDFL is largely rural and enjoys little local

service, this would be a significant improvement in local service. See Eng. Fig. TE-1.

However, this move should not be necessary at all, because developments in MM Docket 87-455 (Perry, Florida) would allow WDFL to achieve its requested upgrade to Channel 295C1, which would eliminate all potential short-spacings and cover white and grey areas. This proposed upgrade was mutually exclusive with a request by Rahu Broadcasting, Inc. to add Channel 295A to Perry, and a competing request by Ray Forrester to add 295A to Live Oak, Florida. Rahu has since withdrawn its expression of interest in a channel at Perry, and Ray Forrester's objective can be reached by adding channel 291A to Live Oak.

In light of these facts, no obstacle to the Micanopy,
Holiday, and Sarasota upgrades exists. In fact, this proposal is
preferred to previous proposals since it accommodates the wishes
of all parties without requiring non-upgrade changes to existing
facilities and offers improved service at Cross City and Beverly
Hills. Therefore, the following changes are proposed:

	Present	Proposed
Micanopy	249A	247C2
Chiefland	247A	300A
Beverly Hills	246A	292A
Holiday	292A	246C2
Sarasota	292A	293C2
Cross City2/	292A	295C1

This change can be made, as described, because of changes in MM Docket 87-455, and would be fully compatible with the changes requested herein. However, this substitution is not necessary to the grant of the other proposals herein.

Beverly Hills, Fl

Short spacings to Holiday vanish when Holiday goes to 246C2. Gator proposal 292A @ 28-52-09 and 82-26-47(these coordinates is substituted for 28-50-19 and 82-32-05.

BARRY J. MAGRILL CRANGE LAKE, FL

FA Channel Study

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1 Chaine (3) stories for class A febribility:
28.
FM translature excluded.
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(ety zone: 20 km + 16 miles).

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This site is 1/34 in distant from the US/Nexican border.

This site is law on oldant from the US/Canadian border.

February 10, 1989

FM Spacing study

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Latitude: 28-52-09 Longitude: 82-26-47 Safety zone: 26 km

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	2900 100 28:55-16 86.7 110.1 105 105.9 482 81-19-09 267.3 5.098 CLOSE
NEW APE WOTEN'S BES SORE	291A 3 30-22-43 314.0 243.6 64 106.1 100 84-16 Z8 133.1 179.6 CLEAR
	2077 3 28-36-51 201.9 70.28 105 106.3 91 82-43-52 21.7 -34.7 988RT 6
	25 16-51 201.9 70.28 105 100.3 81-40-52 21.7 -34.7 SHORT 200-67-465
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	29-36-35 321.1 103.9 105 106.3 83-08-03 140.8 .860 CLOSE 000-87-455
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BARRY J. MASPILL ORANGE LAKE, FL Fage 2 February 10, 1989

FN Spacing study

Title: BEVERLY HILLS, FL Channel 292A (100.8 MHz)

Latitude: 28-52-09 Longitude: 82-26-47

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NEW APP SUMMINEE VA	ALLEY BROADCAS 870112MB	293A 106.5	3 30-13-32 00 82-40-51	351.5 171.4	152.1 64 83.05 CLEAR
W888-FM APP GATER BEGAR MICANIPY FU Affiliated with W860 (AM)	. BPH-881100 ih	2946 1. 106.7 i	25 29-32-08 51 82-19-17	9.3 189.3	74.85 27 47.85 CLEAR
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30 End of channel 2924 study (<

BAFRY J. MAGRILL GRANGE LAKE, FL

Fage 1 February 10, 1989

FM Spacing study

Title: BEVERLY MILLS, FL Channel IPAA (103.3 MHz) Database: FCC 01/24/85

Latitude: 28-52-09 Longitude: 82-26-47 Safety zone: 26 km

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Glearwater		FI BLH-870636KD	95.7	185	82 - 97 - 27	8.8	80.46	CLEAR
ALLUC			7,319 A		30-11-39	354.0	147.7	27
		FE DOC 84-281				173.9	120.7	CLEAR
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Starke		Ft BLH-7682	105.3	37	82-06-16	195.8	17.24	CLEAR

Title: BEVERLY HILES, FL Chapper 297A (108.5 hHz)

Latitude: 28:52-09 Longitude: 82-26-47

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Cross Co	τ.		Tropica and Pan Ri Def-87-455 or South					

To End of channel 292A study (C

Beverly Hills to Cross City

Present spacing between Beverly Hills and Cross City (WDFL). WDFL would need to move 12.7km (from the SE side of the city to the NW side of the city.

FM Channel Study

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Title: BEVERLY HILLS TO CROSS CITY 1 Channel(s) studied for class A feasibility: 246

FM translators excluded.

Coç inates: 29-36-35 83-08-03 Sailly zone: 64 km (39 miles).

The nearest FCC monitoring station is 331 km distant at Vero Beach, FL

This site is 1434 km distant from the US/Mexican border.

This site is 1343 km distant from the US/Canadian border.

- *** -					
Title:	BEVERLY,	HILLS	TO	CROSS	CITY

Channel 246A (97.1 MHz)
Database: DW 04/26/89

Latitude: 29-36-35 Longitude: 83-08-03 Safety zone: 64 km

Call Auth Licensee name City of License St FCC File no.	Freq EAH-m	Longitude	-from	(km)	(km)
NEW APP CROWN BROADCASTING INCOR BEVERLY HILLS FL BPH-871119MC DOC-89-57	246A 3	28-58-24	139.8	92.29	105
NEW APP BEVERLY HILLS BROADCASTI BEVERLY HILLS FL BPH-871119MA DOC-89-57	246A 3 97.1 100	28-52-55 82-31-30	143.7 324.0	100.1 -4.93 S	105 HORT
NEW APP BARBARA M LOWREY BEVERLY HILLS FL BPH-871118MC DOC-89-57	246A 3 97.1 100	28-53-40 82-29-54	142.0 322.4	100.5 -4.48 S	105 HORT
NEW APP FEMALE FREQUENCY BEVPTY HILLS FL BPH-871119MF DOC -57	246A 3 97.1 99	28-51-15 82-31-52	145.0 325.3	102.2 -2.77 s	105 HORT
ALLOC SITE RESTRICTION 8 MI SE BEVERLY HILLS FL DOC-86-267 GRANTED EFF 10/19/87; Filing window 10	246A 97.1 /20-11/19/87	28-50-19 82-32-05	145.7 326.0	103.4 -1.55 S	105 HORT
NEW APP HEART OF CITRUS INCORPOR BEVERLY HILLS FL BPH-871119ME DOC-89-57					
NEW APP JIM JOHNSON BEVERLY HILLS FL BPH-871119MI DOC-89-57	246A 3 97.1 100	28-52-09 82-26-47	140.8 321.1	105.9 .868 C	105 LOSE
NEW APP PEPCAP LIMITED PARTNERSH BEVERLY HILLS FL BPH-871119MH DOC -57	246A 3 97.1 100	28-51-26 82-26-18	140.9 321.3	107.4 2.391 C	105 LOSE

Title: BEVERLY HILLS TO CROSS CITY

Channel 246A (97.1 MHz)

Latitude: 29-36-35

Longitude: 83-08-03

Call Auth Licensee name City of License St FCC File no.	Chan ERP-ki Freq EAH-m	W Latitude Longitude	Br-to -from	Dist. Req. (km)
NEW APP NEW SOUTH COMMUNICATIONS BEVERLY HILLS FL BPH-871119MD DOC-89-57				
WJAD LIC GUARDIAN CORPORATION BAINBRIDGE GA Affiliated with WMGR(AM)	247C 100 97.3 305	31-09-12 84-32-42	322.1 141.4	218.3 169 49.33 CLEAR
WPCV LIC HALL COMMUNICATIONS INCO WINTER HAVEN FL BLH-870213KA Affiliated with WONN(AM)				
WGGG-FM LIC GATOR BROADCASTING CORPO MIC 'OPY FL Aff lated with WGGG(AM)	249A 3 97.7 93	29-32-08 82-19-17	95.8 276.2	79.18 27 52.18 CLEAR
WGGG-FM CP GATOR BROADCASTING CORPO MICANOPY FL BPH-8811031H CP Granted 03/29/89; Affiliated with WG	97.7 151			
NEW APP GREAT SCOTT BROADCASTING VALDOSTA GA BPH-880301NQ	299A 3 107.7 64	30-49-03 83-16-30	354.3 174.2	134.6 8 126.6 CLEAR
NEW CP RANCH & GROVE HOLDING CO COLUMBIA FL BPEX-871215MJ				71.37 8 63.37 CLEAR

>> End of channel 246A study <<

Title: BEVERLY HILLS TO CROSS CIT	litle:	e: BEVERLY	HILLS	TO	CROSS	CIT
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Channel 246A (97.1 MHz)
Database: FCC 03/28/89

Latitude: 29-36-35 Longitude: 83-08-03 Safety zone: 64 km

Call Auth Licensee name City of License St FCC File no.	Chan ERP-kW Freq EAH-m	Latitude Longitude	Br-to Dist. Reqfrom (km) (km)
NEW APC Crown roadcasting, Inc. Beverly Hills FL BPH-871119MC DOC-89-57; Cut-off 07/08/88	246A 3	28-58-24	139.8 92.29 105
NEW APC Beverly Hills Broadcasti Beverly Hills FL BPH-871119MA DOC-89-57; Cut-off 07/08/88	246A 3 97.1 100	28-52-55 82-31-30	143.7 100.1 105 324.0 -4.93 SHORT
NEW APC Barbara M. Lowrey Beverly Hills FL BPH-871118MC DOC-89-57; Cut-off 07/08/88	246A 3 97.1 100	28-53-40 82-29-54	142.0 100.5 105 322.4 -4.48 SHORT
NEW APC Female Frequency Bev y Hills FL BPH-871119MF DOC-89-57; Cut-off 07/08/88	246A 3 97.1 99	28-51-15 82-31-52	145.0 102.2 105 325.3 -2.77 SHORT
ALLOC Beverly Hills FL DOC-86-267 SITE RESTRICTED 8.2 KM SOUTHWEST-EFFEC Filing window 10/20-11/19/87	246A 97.1 TIVE 10-19-8	28-50-19 82-32-05 7;	145.7 103.4 105 326.0 -1.55 SHORT
NEW APC Heart of Citrus, Inc. Beverly Hills FL BPH-871119ME DOC-89-57; Cut-off 07/08/88	246A 2.55 97.1 108	28-53-38 82-26-39	139.8 103.9 105 320.1 -1.11 SHORT
NEW APC Jim Johnson everly Hills FL BPH-871119MI DOC-89-57; Cut-off 07/08/88	246A 3 97.1 100	28-52-09 82-26-47	140.8 105.9 105 321.1 .868 CLOSE
NEW APC Pepcap Limited Partnersh Beverly Hills FL BPH-871119MH DOC-89-57; Cut-off 07/08/88	246A 3 97.1 100	28-51-26 82-^6-18	140.9 107.4 105 321.3 2.391 CLOSE

Title: BEVERLY HILLS TO CROSS CITY

Channel 246A (97.1 MHz)

Latitude: 29-36-35

Longitude: 83-08-03

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Call City of	Auth Licen	Licens	see name St FC	C File no.	Chan Freq	ERP-kW EAH-m	Latitude Longitude	Br-to -from	Dist.	Req. (km)
Beverly	Hills	3		unications PH-871119MD						
				ting, Corp H-881103IH						
WGGG-FM Micanopy	LIC	Gator	Broadcas FL BI	ting Corpo H-851125KF	249A 97.7	3 93	29-32-08 82-19-17	95.8 276.2	79.18 52.18	27 CLEAR
NEW Valdosta Cut-off	1		Scott Br GA BF	oadcasting PH-880301NQ	299A 107.7	3 64	30-49-03 83-16-30	354.3 174.2	134.6 126.6	8 CLEAR
KA2 Z Columbia				ve Holding PEX-871215MJ			30-06-23 82-39-51			

>> End of channel 246A study <<

Holiday, Fl

Short to Beverly Hills, Fl. Ok if Beverly hills is changed to 292A

FM Channel Study

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Title: HOLIDAY

1 Channel(s) studied for class C2 feasibility:

246

FM: anslators excluded.

Coordinates: 28-16-51 82-42-52 Safety zone: 162 km (100 miles).

The nearest FCC monitoring station is 219 km distant at Vero Beach, FL

This site is 1449 km distant from the US/Mexican border.

This site is 1489 km distant from the US/Canadian border.